

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Atreyu Jesse Thompson  
**Debtor 1**

Amber Nicole Thompson  
**Debtor 2**

Freedom Mortgage Corporation  
**Movant(s)**

v.

Atreyu Jesse Thompson  
Amber Nicole Thompson

**Respondent(s)**

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
**Additional Respondent**

**Chapter 13**

**Case No.** 1:18-BK-04825-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 50

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Atreyu Jesse Thompson and Amber Nicole Thompson, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted

3. Admitted.

4. Admitted in part, denied in part. It is admitted that Debtor(s) have failed to tender monthly payments in a manner consistent with the terms of the Mortgage and Note. Debtor(s) are without sufficient knowledge as to Movant's wish to institute foreclosure proceedings; therefore, it is denied.

5. Admitted. On or about September 20, 2021, Debtor(s) made a payment in the amount of approximately \$2,800.00 to bring their account current.

6. Admitted.

7. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 7; therefore, it is denied. Strict proof is demanded

8. Paragraph 8 contains a conclusion of law to which no response is required.

9. Paragraph 9 contains a conclusion of law to which no response is required.

10. Paragraph 10 contains a conclusion of law to which no response is required
11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: September 20, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Monday, September 20, 2021, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Mario Hanyon, Esquire  
BROCK & SCOTT, PLLC  
302 Fellowship Road, Suite 130  
Mount Laurel, NJ 08054  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire